

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

)	MDL Docket No. 2800
In re: Equifax, Inc. Customer)	Case No.: 1:17-md-2800-TWT
Data Security Breach Litigation)	
)	This document relates to:
)	
)	FINANCIAL INSTITUTIONS TRACK
)	

JOINT MOTION FOR STAY OF ALL DEADLINES

The Financial Institution Plaintiffs¹ and Defendants Equifax Inc. and Equifax Information Services LLC respectfully move for a stay of all deadlines in the case.

In support of this motion, the Parties state:

1. The Parties have reached an agreement in principle that—if approved by the Court—will result in a class settlement of all pending claims in the financial institutions track and dismissal of the actions.

2. The Parties are continuing to finalize the details of their agreement and are working on a full draft of their proposed settlement agreement.

¹ The named Financial Institution Plaintiffs are set forth in Paragraphs 12-84 of the Financial Institutions Consolidated Amended Complaint (the “Financial Institutions Complaint”), [Dkt. 390], excluding those dismissed in the Court’s Order on Financial Institution Plaintiffs’ Motion to Dismiss [Dkt. 539] and excluded from the Financial Institution Plaintiffs’ Motion for Leave to Amend the Complaint [Dkt. 941].

3. Under the latest scheduling order, March 6, 2020 is the deadline for Plaintiffs to file an amended complaint in conformance with the Court's orders on the Motion to Dismiss and Motion to Amend, and April 10, 2020 is the deadline for Defendants' response. [Dkt. 962].

4. The Parties believe that a stay of these deadlines will enable them to focus their efforts on finalizing the settlement agreement and related documents and presenting a proposed agreement to the Court for preliminary approval.

5. To ensure continued progress, the Parties propose that the Court permit them a period of at least 60 days in which to either move for preliminary approval or file a joint status report.

WHEREFORE, the Parties respectfully request that the Court stay all deadlines in the case, and order that within 60 days, the Parties either move for preliminary approval of their agreement or file a joint status report. A proposed order is attached for the Court's consideration.

Dated: February 28, 2020

Respectfully submitted,

/s/ Joseph P. Guglielmo

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CERTIFICATE OF COMPLIANCE

I hereby certify pursuant to L.R. 7.1D that the foregoing complies with the font and point selections permitted by L.R. 5.1C. This brief was prepared on a computer using the Times New Roman font (14 point).

/s/ Gary F. Lynch